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Public Comments on Financial Crimes Enforcement Network; Provision of Banking Services to Money Services Businesses:=====

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General Comment:We have been advised by our Trustees that their banks have been closing their

bank accounts due to the high cost of compliance. The guidance provided by FINCEN in April 2005 has done little to curtail banks from closing MSB's bank accounts. More and more banks are getting on the band wagon and closing accounts regardless of the states and federal regulators monitoring and licensing the MSB's.

Banks must understand that they are not responsible for the compliance of the MSB. That they must only show their normal risk based due diligence when dealing with an MSB.